

June 20, 1994

CD-94-12 (LDV/LDT)

SUBJECT: Hood Position and Use of Fans and Accessories in
Conjunction with the Certification Short Test

Dear Manufacturer:

This letter was prompted by a manufacturer's request for information on EPA's planned standard operating procedures for use of fans and accessories in the course of performing confirmatory certification short tests (CSTs). The CST is intended to simulate in the laboratory, to the extent practical, conditions likely to be found associated with inspection and maintenance testing. While 40 CFR 86.1437 and 86.1438 do specify that accessories must be turned off during CST sampling, the regulations are silent about the use of accessories at other points in the test sequence, as well as hood position and the use of fans. This letter serves to clarify EPA's intent with regard to its own testing.

For the purposes of CST confirmatory testing, accessories will not be turned on during the preconditioning mode (and, as prohibited by the CST rule, the sampling mode). Because 40 CFR 86.1406 already requires that dynamometer settings be in accordance with 40 CFR 86.129, which prescribes a road load power adjustment for carlines having more than 33 percent of production equipped with air conditioning, air conditioning will not be turned on during the warmup (505) transient loaded warmup and loaded preconditioning. This prohibition avoids creating an unrepresentative condition that could possibly affect emissions. Air conditioning will be allowed during the wait time. For the cold temperature option, use of the heater would be acceptable for the warmup and wait time. The radio may be on at any time except during preconditioning and the sampling procedure. If keyoffs are performed during the wait time, accessories need not be shut off before restarting the test vehicle.

With regard to cooling fans and hood position, EPA plans to operate vehicles with both the hood up and the fan on during the warmup only. The hood will be closed or "cracked-" open during the wait time; the hood will be fully open during preconditioning and the sampling procedure. Cracking open the hood will be done whenever it is necessary to accommodate leads going under the hood; no

fans will be used when the hood is cracked open. (Idling with the hood open does not reflect what we expect to occur during the wait time in the

field: cracking the hood open is a compromise towards emulating field conditions when electrical leads must be run under the hood.)

If you have any questions about this policy, please contact Ms. Mary Walsh of the Certification Division at (313) 668-4205.

Sincerely,

Robert E. Maxwell, Director
Certification Division
Office of Mobile Sources

cc: Mitch Greenberg (MOD)
Duc Nguyen (CARB)

June 17, 1994

NOTE:

SUBJECT: Hood Position and Use of Fans and Accessories
during the CST

FROM: Mary Walsh, Acting Project Manager
Program Development and Analysis Branch
Certification Division

TO: Bob Maxwell, Director
Certification Division

The attached CD letter incorporates the joint decisions of COD and CD regarding EPA's plan for dealing with hood position and use of fans and accessories during confirmatory testing. I intended this draft as a signature draft if it is satisfactory to you, but I will of course be happy to redraft based on any additional comments you may have. Below I have indicated concurrences:

CD/CPB Chief:_____

CD/PDAB Chief:_____

EOD/TPB Chief:_____

Attachment